

**IN THE UNITED STATES DISTRICT COURT  
FOR SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**ANNA WORSHAM**

**Plaintiff,**

**v.**

**ANTHEM INSURANCE COMPANIES,  
INC., et al.,**

**Defendants.**

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**Case No. 2:21-cv-02481**

**Judge**

**NOTICE OF REMOVAL OF CIVIL ACTION TO FEDERAL COURT**

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendants Anthem Insurance Companies, Inc. dba Anthem Blue Cross and Blue Shield (“Anthem”) and Anthony Chaney (“Chaney”) (collectively, “Defendants”) hereby remove this action, Case Number A 2101222 in the Court of Common Pleas of Hamilton County, Ohio, to the United States District Court for the Southern District of Ohio, Eastern Division. Removal is proper on the following grounds:

1. This action was filed in the Court of Common Pleas of Hamilton County, Ohio on April 8, 2021. A copy of the docket in the state court action confirming the filing date and dates of service is attached hereto as Exhibit A.

2. Anthem was served with a Summons and a copy of the Complaint on April 15 and 16, 2021. Thirty (30) days have not yet expired since this action became removable; thus, removal is timely pursuant to 28 U.S.C. § 1446(b)(1).

3. Chaney was served with a Summons and a copy of the Complaint on April 15, 2021. Thirty (30) days have not yet expired since this action became removable; thus, removal is timely pursuant to 28 U.S.C. § 1446(b)(1).

4. Both Anthem and Chaney consent to this removal action.

5. In her Complaint, Plaintiff Anna Worsham (“Plaintiff”) alleges violations of federal law. More specifically, Plaintiff claims that Anthem retaliated against her in violation of the Family and Medical Leave Act. (*See* Compl. at Count V.) Further, pursuant to state law, Plaintiff alleges that Defendants discriminated against her on the basis of race, disability, and sex/gender and retaliated against her. (*See* Compl. at Counts I-IV.) Because Plaintiff brings claims under the laws of the United States in her Complaint, this Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331.

6. This Court has supplemental jurisdiction over Plaintiff’s state law claims under 28 U.S.C. § 1367 because Plaintiff’s federal and state law claims are so related that they form part of the same case or controversy.

7. Venue is proper in this Court pursuant to 28 U.S.C. §§ 115 and 1391(b)(2).

8. As required by 28 U.S.C. § 1446(d), a Notice to State Court of Removal of Civil Action to Federal Court, along with a copy of this Notice of Removal, will be promptly filed with the Court of Common Pleas of Hamilton County, Ohio. A copy of the Notice to State Court of Removal is attached hereto as Exhibit B. A copy of the Notice to State Court of Removal of Civil Action to Federal Court will also be promptly served on Plaintiff’s counsel.

**WHEREFORE**, Defendants respectfully request that this matter be removed from the Court of Common Pleas of Hamilton County, Ohio to the United States District Court for the Southern District of Ohio, Eastern Division, and that all proceedings hereafter in this matter take place in the United States District Court for the Southern District of Ohio, Eastern Division.

Dated: May 13, 2021

Respectfully submitted,

/s/Janay M. Stevens

Natalie M. McLaughlin, Trial Attorney (#0082203)

Janay M. Stevens (#0090515)

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*Attorneys for Defendants  
Anthem Insurance Companies, Inc. and  
Anthony Chaney*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 13, 2021, a true and accurate copy of the foregoing was filed electronically and served via the Court's electronic filing system upon the below counsel of record:

Matthew G. Bruce  
Evan R. McFarland  
The Spitz Law Firm, LLC  
11260 Chester Rd., Suite 825  
Cincinnati, Ohio 45246

*Counsel for Plaintiff Anna Worsham*

/s/ Janay M. Stevens

Janay M. Stevens (0090515)

*Attorney for Defendants  
Anthem Insurance Companies, Inc. and  
Anthony Chaney*